

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Chapter 13

ANTOINETTE R. BYRD

Debtor

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:
:

Bankruptcy No. 16-15336AMC

CHAPTER 13 STANDING TRUSTEE'S MOTION TO MODIFY PLAN

AND NOW, WILLIAM C. MILLER, ESQUIRE, Chapter 13 standing trustee, requests that debtor's plan be modified, pursuant to 11 U.S.C. Section 1329 (a)(1), as follows:

1. Debtor filed the above-captioned bankruptcy case on July 28, 2016 and a plan was confirmed on January 25, 2017 ("Plan").
2. The Plan provided that Specialized Loan Servicing ("Secured Creditor") would be paid their arrearage claim of \$72,561.87.
3. Secured Creditor was granted Relief from Stay on March 21, 2017, and has refused subsequent funds disbursed to it by the standing trustee.
4. The standing trustee therefore requests that the Plan be amended to (1) decrease Secured Creditor's claim to the amount paid by the standing trustee, and (2) allocate funds which would have been paid to Secured Creditor to other creditors as provided for in the plan.

WHEREFORE, WILLIAM C. MILLER, ESQUIRE, Chapter 13 standing trustee, requests that the Court enter an Order in the form annexed hereto.

Respectfully submitted,

/s/ Jack K. Miller

Date: November 27, 2017

Jack K. Miller, Esquire for
William C. Miller, Esquire
Chapter 13 Standing Trustee